

CERTIFIED MAIL 91 7199 9991 7030 4900 8388

May 31, 2012

Harcros Chemicals Inc. Attn: John Miles General Manager 4280 Riffle Range Road Vicksburg, MS 39180

Re: Quapaw Products LLC

Former Cedar Chemical Company, Helena – West Helena, Arkansas

Dear Mr. Miles:

The Arkansas Department of Environmental Quality – Hazardous Waste Division (ADEQ) performed a site inspection of the former Cedar Chemical site in Helena-West Helena, Arkansas on April 27, 2012. The following items were observed or discussed during the site visit:

- 1. ADEQ personnel observed cracked asphalt where a pole had been pulled out and holes where the poles of the shed had been cut off. These areas should be patched and filled to prevent seepage of water and potential exposure to the chemicals of concern beneath the asphalt.
- 2. An employee of Harcros indicated your intent to demolish the "old" lab building due to flooding and mold issues. This building was not included in the demolition remedy in the Remedial Action Decision Document for the former Cedar Chemical site. ADEQ concurs with this decision. Please submit a demolition plan 30 days prior to demolition work.
- 3. A Harcros employee discussed cost estimates and the need for underground utilities in order for Harcros to utilize Unit 5. ADEQ reminds Harcros, that site usage according to the lease agreement is currently restricted to "a wood products process and manufacturing facility." Paragraph 7 of the Lease Agreement with Option to Purchase states: "Lessor requires Lessee to obtain express written approval of ADEQ for any contemplated alterations to the Premises or for any desired change in site usage." If Harcros desires to change the site usage or make alterations to the Premises then you must notify ADEQ and obtain our written approval. It will take time to examine and approve any such requests so Harcros should provide ADEQ with detailed plans to make alterations well in advance of any contemplated construction activities.

- 4. ADEQ was informed that Harcros is working with Clean Harbors LLC to dispose of the waste from renovation of a sump. ADEQ would like updates on the characterization and disposal every two weeks.
- 5. Investigation Derived Waste (IDW) has been discovered at the site by a Harcros employee. Please make arrangements to have the IDW disposed within 45 days of receipt of this letter.

If you have any questions, please contact me at 501-682-0841 or <u>cusher@adeq.state.ar.us</u>.

Sincerely,

Annette Cusher, P.E. Engineer Supervisor

Technical Branch

Hazardous Waste Division

amette Cuelon

cc: John Peiserich, Attorney, Perkins and Trotter PLLC, P.O. Box 251618, Little Rock, AR

72225-1618

Dara Hall, Attorney, ADEQ

ADEQ

Hazardous Waste Division Technical Branch Trip Report

Project	Cedar Chemical Site							
Location	Helena-West Helena							
Date	4/27/2012							
Time	1100 to 1136 hours							
Reason	Monthly Site Visit							
ADEQ personnel	Annette Cusher Jim Rigg							
	Jim Rigg							
Facility,	Mr. Harrington							
contractor and								
EPA personnel	·							
Activity	Jim and I were met upon arrival at the site by Mr. Harrington. The							
Summary	following issues were discussed during the walk through.							
	A pole was removed cracking the asphalt while demolishing a shed. The remaining poles were cut off at the level of the							
	a shed. The remaining poles were cut on at the level of the asphalt.							
	The old lab building is collecting water after rain events and							
	has become moldy. Harcross would like to demolish the							
	building.							
	The waste from the renovation of the sump is still covered							
	on a slab. Mr. Harrington indicated Harcross was in contact							
	with Clean Harbors for disposal.							
	Mr. Harrington also indicated that Harcross would be							
	running underground utilities when they begin to utilize the							
	unused unit.							
	There are several five gallon buckets of what appears to be purge water (buckets are labeled with monitoring well							
	numbers) still on-site. Harcross would like to know what							
	should be done with the containers.							
	There is a desk and files being moved into the warehouse.							
	Harcross is planning on placing fresh gravel in the boneyard							
	and placing the "loose" equipment into the boneyard to							
	improve the look of the site.							
	There are some empty, damaged containers in a area of the							
	site. Harcross indicated that Enviro Tech has been told to							
TOTAL PROPERTY OF THE PROPERTY	properly dispose if the waste containers.							
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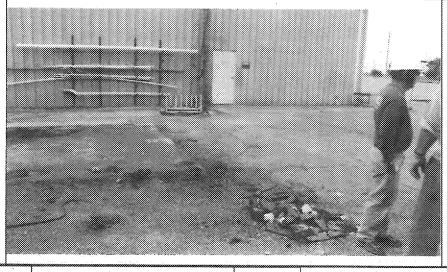
Action Items	Give Mr. Harrington an update on the purge water.
Summary	
Anticipated	Potential items to be discussed regarding the lease:
follow-up	 Repair asphalt, fill holes inside poles.
	 Underground utilities
	 Which process is Quapaw planning to run at the site?
	Demolition of the lab
	 Continued updates on the disposal of the waste pile.
Other	

Route to:

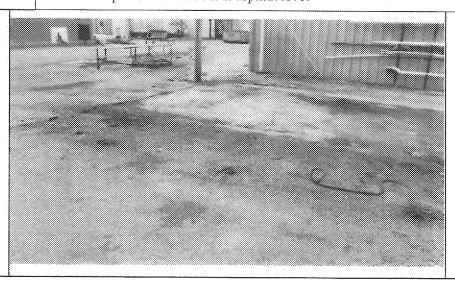
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Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Ced	edar Chemical Site									
Photograp	A. C	usher		Witness	:	J. Rigg					
Photo #	1	Of	6		Date:	4	/27/2012	1			
Descriptio	Crac	ked asp	halt from pole remov	al		***************************************	Westernoonan				



Photographer:					Witness	: J. Rigg	000000000000000000000000000000000000000	
Photo #	2	Of	6		Date:	4/27/2012	Time:	
Description	n:		where	poles were cut off at	asphalt le		decension of the second	

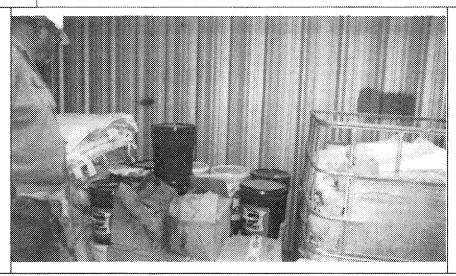


Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

Location:	Ced	edar Chemical Site									
Photograp	A. Cusher			Witnes	Witness: J. Rigg						
Photo #	3	Of	6		Date:	4	//27/2012	Time:			
Description	n:	Cove	ered wa	ste pile	***************************************		***************************************	b	······		



Photograp	1		usher		Witness	: J. Rigg		
Photo #	4	Of	6		Date: 4/27/2012		Time:	
Description	m:	5 gal	llon con	tainers of purge wate	r			***************************************



Arkansas Department of Environmental Quality (ADEQ)
Official Photograph Sheet

Location:	Ceo	edar Chemical Site									
Photograp	her:				Witness	:	J. Rigg				
	5	1			Date:	4	/27/2012	Time:			
Descriptio	n:	Clos	e up of	gallon container lat	oel		***************************************				



	Photographer:					Witness: J. Rigg				
]	Photo #	6	Of	6		Date:	4/27/2012	Time:		
]	Descriptio	m:	Dam	iaged ei	npty containers					





HAZARDOUS WASTE DIVISION ROUTING SLIP

May 23, 2012

Subject: Former Cedar Chemical Site

From: A. Cusher AC

Route in turn to: Action Needed

on Needed Initials Date

Tammie Hynum Concurrence Review

Clyde Rhodes, Jr. Doncurrence & Beview Ryan Bene Reld

*Note: Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.

DISPOSITION:

Return to Annette Cusher

COMMENTS: [Insert a brief description of the contents being routed]

Several items need addressed from a site visit to Cedar.